



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 20, 2021

BY ECF

The Honorable Richard J. Sullivan
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

IT IS HEREBY ORDERED that the internal chronologies maintained by Probation detailing Probation's supervision of Ivan Canales be immediately unsealed and produced to the government and Canales's counsel for use in connection with Canales's VOSR proceedings.

SO ORDERED:
Dated: 07/20/21 RICHARD J. SULLIVAN
U.S.C.J., Sitting by Designation

Re: *United States v. Ivan Canales, 11 Cr. 676 (RJS)*

Dear Judge Sullivan:

The Government submits this letter, with the consent of the United States Probation Office (“Probation”), to respectfully request that internal chronology reports maintained by Probation, detailing Ivan Canales’s supervision, be unsealed.

The Court has scheduled a VOSR hearing in this case for August 3, 2021. At that hearing, the Government intends to prove each of the eight specifications set forth in the July 7, 2021 Amended Violation Report (the “Specifications”). The Government further anticipates that it may call a Probation Officer, among other witnesses, to testify at the hearing. Probation has indicated that they have information relevant to the Specifications and upcoming hearing contained within their chronologies. Accordingly, the Government respectfully requests that the Court enter an order unsealing these chronology reports in advance of the hearing. According to the assigned U.S. Probation Officer, upon order of the Court, the Probation Office will disclose its records to both the Government and the defendant.

Respectfully submitted,

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cc: John Burke, Esq. (by ECF)